

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Pennsylvania

United States of America  
v.

Anthony FEDELE

Case No.  
24-mj-922

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 18, 2024 in the county of Montgomery in the  
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section	Offense Description
21 U.S.C. § 841(a)(1), (b)(1)(C)	distribution of a controlled substance

This criminal complaint is based on these facts:  
See attached statement in support of this criminal complaint.

☒ Continued on the attached sheet.

/s/ Philip Lioi  
Complainant's signature

Phillip Lioi, Special Agent, HSI  
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 06/03/2024

City and state: Philadelphia, PA

Craig M. Straw  
Digitally signed by Craig M. Straw  
Date: 2024.06.03 15:39:12 -04'00'

Judge's signature

The Honorable  
Printed name and title

## **AFFIDAVIT OF PROBABLE CAUSE**

I, Phillip Lioi, a Special Agent with Homeland Security Investigations, being duly sworn, deposes and states:

1. I am employed as a Special Agent by Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”). I am currently assigned to the Office of the Special Agent in Charge in Philadelphia as a member of the Cyber Crimes Investigations Task Force (“C2iTF”). I have been employed as a Special Agent with HSI since March 2021. I have received specialized training at the Federal Law Enforcement Training Center located in Glynco, Georgia. This law enforcement training included investigations into the smuggling of narcotics into the United States, money laundering, and cybercrimes. Prior to joining ICE/HSI, I was employed as an Anti-Money Laundering Investigator at JPMorgan Chase & Co. In this role, I participated in hundreds of investigations of money laundering and other violations of the Bank Secrecy Act. Prior to joining HSI, I worked as an Anti-Money Laundering Specialist at the Digital Federal Credit Union. During my time in this role, I participated in numerous investigations into money laundering and other violations of the Bank Secrecy Act.

2. Since becoming a Special Agent, I have participated in numerous drug trafficking investigations, during which I have conducted physical and electronic surveillance, debriefed confidential sources, interviewed witnesses, worked with experienced federal, state, and local narcotic agents and officers, executed search warrants, and analyzed telephone toll records. I have also received training and gained experience in computer-based crimes, computer evidence identification, and computer evidence seizure and processing. I have participated in numerous drug and financial investigations conducted by HSI and other law enforcement agencies that resulted in the arrest of numerous subjects, the seizure of controlled substances, and the seizure of property, illicit proceeds, including Bitcoin and other virtual currencies, and other assets. While participating in these and other criminal investigations, I have executed search warrants on residences and

vehicles. As a result of my training and experience, interactions with other Special Agents, Task Force Agents/Officers, and other investigators, I have become knowledgeable regarding the methods employed by criminal organizations to traffic in narcotics.

3. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigation of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

4. Based on the information outlined in this affidavit, as well as my training and experience, I have probable cause to believe that Anthony FEDELE has violated 21 U.S.C. §§ 841(a)(1), (b)(1)(C), distribution of a controlled substance.

5. This affidavit is based upon my personal knowledge, experience and training, and other information developed during the course of this investigation. This affidavit is also based upon information and experience imparted to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause for an arrest, your affiant has not included each and every fact known to me concerning this investigation. Your affiant has set forth only the facts that your affiant believes are necessary to establish probable cause to believe that FEDELE has committed the crime charged in the criminal complaint.

#### **STATEMENT OF PROBABLE CAUSE**

6. In or around January 2019, HSI Philadelphia’s Cyber Crimes Investigations Task Force (“C2iTF”) began investigating CRYPTTRONIX LLC,<sup>1</sup> which operated as an unlicensed

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<sup>1</sup> The initial financial investigation into FEDELE and CRYPTTRONIX LLC identified over \$2,000,000 in cash deposits made to various bank accounts owned by FEDELE, CRYPTTRONIX LLC, or known associates of FEDELE. During the timeframe that the deposits were made, FEDELE also operated on LocalBitcoins, which was a peer-to-peer Bitcoin exchange headquartered in Helsinki, Finland. FEDELE registered on LocalBitcoins in or around 2016 with the username “Smoochacho” and used the email address: maddrama@aol.com. When opening the account, FEDELE provided his date of birth – August 15, 1971, and an address of

Money Service Business for peer-to-peer cryptocurrency exchanges. CRYPTTRONIX LLC was owned and operated by Anthony FEDELE, a resident of Philadelphia, Pennsylvania. Bank records obtained by C2iTF investigators revealed that the email address associated with CRYPTTRONIX LLC and FEDELE was “maddrama@aol.com.”

7. Data obtained from various sources, including FEDELE’s pharmacy benefits manager and prescription mail delivery service, OptumRx, indicated that from January 2016 to April 2024, FEDELE has obtained over 200 prescriptions for oxymorphone 40 milligram tablets and oxycodone 30 milligram tablets, for a total of approximately 35,000 pills. Oxycodone and oxymorphone are a potent schedule II opioid analgesic drug with an abuse liability like morphine and other schedule II opioids.

8. C2iTF investigators suspect that FEDELE previously operated on various darknet marketplaces, and currently operates using an encrypted email service, where he advertises oxymorphone and oxycodone pills for sale, communicates with customers, and provides instructions on how to pay for the narcotics using cryptocurrency.

9. In and around April 2023, your affiant conducted analysis of USPS shipping labels paid for with cryptocurrency in order to identify potential customers of FEDELE. From this analysis, your affiant identified James Martin, residing at 1006 18th Street NW, Puyallup, Washington 98371 and began tracking packages that were sent to Martin beginning in January 2024.

10. On April 18, 2024, law enforcement initiated surveillance of FEDELE in the area of his residence located at 215 Parkview Road, Philadelphia, Pennsylvania 19154.

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215 Parkview Road, Philadelphia, Pennsylvania 19154. HSI C2iTF investigators suspected that FEDELE was using his LocalBitcoins account to sell Bitcoin that represented proceeds from selling controlled substances on darknet marketplaces.

11. At approximately 5:34 p.m., law enforcement observed FEDELE exit his home while carrying a white bag. He was subsequently seen driving his Mercedes to the Dollar Tree located at 101 Franklin Mills Boulevard in Philadelphia where he parked and entered at around 5:51 p.m. At around 6:02 p.m., FEDELE left the Dollar Tree and drove to the CVS located at 12301 Knights Road in Philadelphia. He entered the CVS at 6:08 p.m., stayed inside for several minutes, and then left the area at around 6:16 p.m.

12. FEDELE returned to his residence and parked his car on Parkview Road. Law enforcement observed FEDELE walking from his car and entering his house at approximately 6:28 p.m. while carrying a brown bag. FEDELE remained inside for a short period and then left the house at approximately 6:54 p.m. while carrying a green and white bag. FEDELE walked to his Audi SUV that was parked down the street with a trailer attached to it and backed into his driveway. There, he got out and detached the trailer, got back in the car, and drove away.

13. Law enforcement followed FEDELE to Wawa, where he parked at about 7:11 p.m. FEDELE got out of the Audi SUV while carrying a small white box and walked to the front of the Wawa where a USPS mailbox is located. Agents observed FEDELE attempt to place the white box in the mailbox, but it was too large, and it would not fit in the mail slot. FEDELE walked back to the car while holding the white box and thereafter lost sight of FEDELE's movements.

14. Thereafter, agents identified that on April 19, 2024, a package was sent to James Martin at the address above with a return address of Petsource Treats LLC, 511 Exton Road, Rear Apt., Hatboro, PA. Tracking information associated with the package showed that it was scanned at the United States Post Office located at 575 Horsham Road in Horsham. Agents went to the post office and reviewed security footage from April 18, 2024. The footage showed that at approximately 7:42 p.m., FEDELE arrived at the post office parking lot in his Audi SUV, parked, and walked toward the USPS mailbox holding what appeared to be the same white box that he had

carried with him at the Wawa. FEDELE was out of range of the security camera for a few seconds and then walked back toward the Audi in the parking lot empty handed.

15. On April 25, 2024, USPIS obtained federal search warrant number 24-MJ-707 from United States Magistrate Judge Carol Sandra Moore Wells to search the contents of the package sent to James Martin. After initially opening the parcel, your affiant discovered a yellow/tan 6-inch by 9-inch paper mailer made by Caliber. Upon opening the paper mailer, your affiant discovered a purple and white bag of Temptations cat treats. After opening the bag of Temptations cat treats, your affiant discovered a black zip lock style bag, which contained orange pills imprinted with "G74". Your affiant weighed the pills and reported a total gross weight of 31 grams. At that time, the pills were turned over to DEA Special Agents which were later confirmed to contain Oxymorphone.

16. Thereafter, law enforcement obtained security footage from inside of the CVS Pharmacy located at 12301 Knights Road in Philadelphia – where agents had observed FEDELE enter on April 18, 2024. During the timeframe that FEDELE was inside the CVS, agents saw FEDELE on the security footage purchase a Caliber paper mailer, two bottled drinks, and a pack of batteries. The paper mailer that FEDELE purchased is the same Caliber paper mailer that your affiant located inside of the package containing Oxymorphone that was addressed to James Martin.

## CONCLUSION

17. Based on the facts set forth above, I request an arrest warrant be issued based on probable cause that Anthony FEDELE has violated Title 21, United States Code Section 21 U.S.C. §§ 841(a)(1), (b)(1)(C), distribution of a controlled substance.

/s/ Phillip Lioi  
Phillip Lioi  
Special Agent  
Homeland Security Investigations

Sworn to before me this 3rd day  
of June 2024:

Craig M.  
Straw

Digitally signed by Craig  
M. Straw  
Date: 2024.06.03  
15:37:51 -04'00'

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HONORABLE CRAIG M. STRAW  
United States Magistrate Judge